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 RALPH LAUREN CORPORATION

17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

19

20 RICHARD PAUL MERRELL, individually  
 and on behalf of all others similarly situated,

Case No. 4:23-cv-06669-HSG  
 Honorable Haywood S. Gilliam, Jr.

22 Plaintiff,

**STIPULATION AND  
ORDER CONTINUING PLAINTIFF'S  
CLASS CERTIFICATION FACT  
DISCOVERY CUTOFF**

23 v.

24 RALPH LAUREN CORPORATION, a  
 Delaware Corporation; and DOES 1 to 10,  
 25 inclusive,

26 Defendants.

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1 Plaintiff Richard Paul Merrell (“Plaintiff”) and Defendant Ralph Lauren Corporation  
 2 (“Defendant”) (collectively, the “Parties”) submit this stipulation and proposed order to continue  
 3 Plaintiff’s class certification fact discovery cutoff date in this matter for a period of three (3)  
 4 weeks to allow Defendant additional time to produce documents. The Parties’ stipulation is based  
 5 on the following:

6 WHEREAS, on December 28, 2023, prior named class representative, Vivian Salazar  
 7 (“Salazar”), filed her class action complaint against Defendant;

8 WHEREAS, on May 23, 2024, Defendant filed its answer to Salazar’s complaint;

9 WHEREAS, on December 17, 2024, the Parties attempted to mediate this matter;

10 WHEREAS, the mediation was unsuccessful, thus, on January 21, 2025, the Court held a  
 11 case management conference and set the close of fact and expert discovery related to class  
 12 certification for July 1, 2025;

13 WHEREAS, on May 12, 2025, due to Salazar wishing to withdraw as named class  
 14 representative, the Parties submitted a joint statement regarding extending scheduling deadlines  
 15 and leave to file a proposed amended complaint;

16 WHEREAS, on May 21, 2025, the Court granted leave to file an amended complaint;

17 WHEREAS, on May 21, 2025, Salazar was replaced by Plaintiff in the First Amended  
 18 Complaint;

19 WHEREAS, on May 21, 2025, the Court reset the Parties’ deadlines and set the close of  
 20 fact and expert discovery related to class certification of August 12, 2025;

21 WHEREAS, on May 21, 2025, Plaintiff served his First Set of Document Requests Related  
 22 to Class Certification and his First Set of Interrogatories Related to Class Certification;

23 WHEREAS, on July 1, 2025, Plaintiff served a deposition notice of Defendant’s employee,  
 24 Sadiki Christie with Document Requests;

25 WHEREAS, on July 1, 2025, Plaintiff served a Rule 30(b)(6) deposition notice of  
 26 Defendant with Document Requests;

27 WHEREAS, on July 1, 2025, Plaintiff served his Second Set of Document Requests  
 28 Related to Class Certification;

1        WHEREAS, on July 17, 2025, the Parties stipulated to continue the class certification  
 2 discovery deadline to September 2, 2025, only for the purpose of allowing Plaintiff to take the  
 3 deposition of Ralph Lauren employee, Sadiki Christie, because Mr. Christie was not available for  
 4 his noticed depositions (noticed for August 11 and 12, 2025) due to vacation;

5        WHEREAS, on July 23, 2025, the Court granted the stipulation and extended the class  
 6 certification deadline to September 2, 2025, for the limited purpose of allowing Plaintiff to take  
 7 Mr. Christie's deposition;

8        WHEREAS, on August 13, 2025, the Court granted the Parties' prior stipulation extending  
 9 the class certification discovery deadline as well as extending the class certification briefing  
 10 schedule (ECF No. 74) to allow Defendant additional time to produce documents;

11        WHEREAS, Defendant needs an additional three (3) weeks to produce documents  
 12 responsive to Plaintiff's Document Requests, up to and including to October 14, 2025;

13        WHEREAS, good cause exists to extend the fact discovery deadline for class certification  
 14 because Plaintiff needs all documents potentially relevant to class certification;

15        WHEREAS, the Parties respectfully request the Court continue the class certification  
 16 discovery cutoff to October 14, 2025 for the sole purpose of allowing Defendant additional time to  
 17 produce documents.

18        **NOW THEREFORE THE PARTIES STIPULATE AND AGREE AS FOLLOWS:**

19        That the class certification discovery cutoff date of September 23, 2025, be continued to  
 20 October 14, 2025.

21        That the scheduling order be modified as follows:

Event	Prior Court-Ordered Deadline	Proposed New Deadline
Close of Fact Discovery	September 23, 2025	October 14, 2025
Related to Class Certification		

27        **IT IS SO STIPULATED**

1 Pursuant to the Northern District of California's Local Rule 5-1(i)(3), I attest that the  
2 concurrence in the filing of the document has been obtained from each of the other Signatories.

3  
4 Dated: September 23, 2025

5 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

6  
7 By /s/ Michael J. Chilleen  
8 MICHAEL J. CHILLEEN  
9 Attorneys for Defendant,  
RALPH LAUREN CORPORATION

10 Dated: September 23, 2025

11 WILSHIRE LAW FIRM, PLC

12  
13 By /s/ Thiago M. Coelho  
14 Thiago M. Coelho  
15 Attorneys for Plaintiff,  
RICHARD PAUL MERRELL

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## ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 9/24/2025

~~Haywood S. Gilliam~~  
Honorable Haywood S. Gilliam, Jr.  
UNITED STATES DISTRICT COURT